

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
1. Adolfo RIVERA-Hernandez (1990/MX)) Case No. F: 18 mij 2381
2. Alicia HERNANDEZ-Arguello (1966/MX))
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of November 8, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 952 Illegal Importation of a Controlled Substance / Approximately 10.84 Kilograms of Cocaine, a Schedule II Controlled Substance.

21 USC § 963 Conspiracy to Illegally Import a Controlled Substance / Approximately 10.84 Kilograms of Cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

Continued on the attached sheet.

Approved by


Sworn to before me and signed in my presence.

Date: 11/09/2018 - 8:30 a.m.

City and state: McAllen, Texas

 Robert C. Stott
Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title


Judge's signature

agistrate Judge Juan

Attachment "A"

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On November 8, 2018, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations (OFO) at the Pharr Port of Entry (POE) in Pharr, Texas. CBP Officers (CBPOs) detained Adolfo RIVERA-Hernandez (hereafter RIVERA), a citizen of Mexico, and Alicia HERNANDEZ-Arguello (hereinafter HERNANDEZ) while attempting to enter the U.S. with approximately 10.84 kilograms (kg) of cocaine concealed within the rocker panels of the Volkswagen Jetta passenger car they were occupying.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred RIVERA, HERNANDEZ and the vehicle to secondary inspection for an intensive examination due to a lookout.
3. During secondary inspection, a CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
4. A physical search of the vehicle was conducted, and 10 tape wrapped packages, weighing approximately 10.84 kilograms, were discovered concealed within an aftermarket constructed concealed compartment in the rocker panels of the vehicle. CBPOs field tested the substance inside the packages which were positive for the characteristics of cocaine.
5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Pharr POE to assist in the investigation. HSI SAs interviewed RIVERA who stated he was hired by an unknown person in Mexico and to be paid \$200.00 USD to transport what he was told to be United States currency from the United States into Mexico. However, RIVERA stated he suspected he was in reality transporting drugs into the United States. RIVERA also stated his mother, HERNANDEZ, accompanied him to provide legitimacy for the trip, and she also knew of the illegal activity. SAs interviewed HERNANDEZ, who stated she suspected they were transporting drugs into the United States.
6. RIVERA and HERNANDEZ will be charged with one count of Illegal Importation of a Controlled Substance, in violation of 21 USC § 952 and one count of Conspiracy to Illegally Import a Controlled Substance, in violation of 21 USC § 963.